

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL PRODUCTS, INC.,

Plaintiff,

v.

GAMBER-JOHNSON LLC,

Defendant.

Civil Case No. CV08-0049-JLR

**STIPULATED MOTION TO SEAL
PLAINTIFF'S MOTION FOR
LEAVE TO SUPPLEMENT
EVIDENCE IN OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT AND
CERTAIN EXHIBITS TO THE
SUPPLEMENTAL DECLARATION
OF MARK P. WALTERS**

**Note on Motion Calendar:
Tues., January 26, 2010**

Plaintiff, National Products, Inc. ("NPI"), through its counsel of record hereby moves for an order sealing Plaintiff's Motion for Leave to Supplement Evidence In Opposition to Defendant's Motion for Summary Judgment and Exhibits B and C to the [Proposed] Supplemental Declaration of Mark P. Walters in Opposition to Defendant's Motion for Summary Judgment. A compelling reason exists for sealing certain information contained in these documents, said information including customer names and other confidential information of third party witness General Dynamics/Itronix ("GDI"). As explained in the accompanying Declaration of Mark P. Walters In Support of Plaintiff's Motion to Seal, GDI maintains this information in confidence as a trade secret. GDI's trade

1 secret right in its customer names and other information outweighs the public's need
2 to know this information for the purposes of the Court's consideration of Defendant, Gamber
3 Johnson LLC's ("Gamber"), Motion for Summary Judgment (Docket No. 85). NPI has met
4 and conferred with Defendant Gamber-Johnson LLC, who has indicated through counsel
5 that there is no opposition to the Court's entry of an order sealing the above identified
6 documents.

7 Dated: January 26, 2010

9 By:s/ Mark P. Walters

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By:s/ Jonathan D. Jay

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CERTIFICATE OF SERVICE

I, Marlon R. Muñoz, hereby certify that on January 26, 2010, I caused the foregoing to **STIPULATED MOTION TO SEAL PLAINTIFF'S MOTION FOR LEAVE TO SUPPLEMENT EVIDENCE IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND CERTAIN EXHIBITS TO THE SUPPLEMENTAL DECLARATION OF MARK P. WALTERS** be served on the following parties as indicated below:

Mark S. Parris ORRICK HERRINGTON & SUTCLIFFE LLP 701 Fifth Avenue, Ste. 5700 Seattle, WA 98104-7097 <i>Attorneys for Defendant Gamber-Johnson LLC</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email [by agreement of counsel] mparris@orrick.com
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DATED: January 26, 2010

s/ Marlon R. Muñoz
for David K. Tellekson, WSBA No. 33523
Robert L. Jacobson, WSBA No. 30838
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